GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL

AUDIT OF THE
DISTRICT OF COLUMBIA PUBLIC SCHOOLS'
INCIDENT REPORTING

AUSTIN A. ANDERSEN
Interim Inspector General

September 7, 2004

Dr. Robert C. Rice
Interim Superintendent
District of Columbia Public Schools
825 North Capitol Street, N.E., 9th Floor
Washington, D.C. 20001

Dear Dr. Rice:

Enclosed is the final audit report summarizing the results of the Office of the Inspector General's (OIG) Audit of the District of Columbia Public Schools' Incident Reporting (OIG No. 03-2-14GA(a)).

Our audit report contains five recommendations for necessary actions to correct the described deficiencies. We received a response dated August 31, 2004, to the draft report from the Interim Superintendent, D.C. Public Schools (DCPS). The DCPS comments set forth specific corrective actions relative to improving the incident reporting process at DCPS. We consider actions taken and/or planned by DCPS to be fully responsive to our recommendations. The full text of the DCPS response is at Exhibit B.

We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please contact William J. DiVello, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,

Austin A. Andersen
Interim Inspector General

AAA/ws

Enclosure

cc: See distribution list

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AUDIT OF THE DISTRICT OF COLUMBIA PUBLIC SCHOOLS' INCIDENT REPORTING

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EXECUTIVE DIGEST

OVERVIEW

This audit is the fourth in a series of audits by the District of Columbia Office of the Inspector General (OIG) that evaluates the District of Columbia Public Schools' (DCPS) management and operation of the school security program. This report summarizes the results of our review of DCPS's Incident Reporting. The first two reports covered DCPS' management of Homeland Security funds and procurement of school security services for the period October 1996 to July 2003. The third audit covered the solicitation and award of the school security services contract with the Watkins Security Agency of the District of Columbia, Inc. (Watkins, Inc.). We plan to issue additional audit reports that will focus on the following issues: physical security at District public schools; the adequacy of training and background investigations for school security personnel; and a comparison of best practices relating to school security within the DCPS system (internally) with other similar municipal public school districts.

CONCLUSION

DCPS has not developed a comprehensive, security incident-reporting system to centrally record and track all school security incidents from initiation to final disposition. The lack of a comprehensive management information system is further complicated by inconsistent or undeveloped school security policies and procedures which, in turn, contributed to DCPS' inability to provide the final disposition of reported incidents. Many of the serious incidents appear to have not been resolved in a timely manner. For example, in some of the serious incidents that were recorded, DCPS has not updated their "current disposition" for over 1 year. A comprehensive system would afford DCPS management the ability to monitor and track school incidents for several important purposes, e.g., timely resolution of incidents, reduction of teacher administrative leave, documentation of the event up to final disposition, and monitoring of student behavior to prevent recurring incidents, especially by the same student.

Further, the lack of accurate and complete incident reporting data could result in DCPS not having accurate incident information necessary to comply with the No Child Left Behind (NCLB) Act's requirement to designate unsafe schools as "persistently dangerous" and the reporting requirements of the Federal Gun-Free Schools Act (GFSA).

EXECUTIVE DIGEST

CORRECTIVE ACTIONS

We directed five recommendations to DCPS that we believe are necessary to correct the deficiencies noted in this report. The recommendations, in part, center on:

- establishing definitive policies and procedures governing the process for resolving reported incidents;

- developing operational procedures to standardize data elements entered into the incident reporting system;

- notifying parents or guardians of student infractions and disciplinary actions;

- updating the incident-reporting database to reflect the final disposition of each incident; and

- reviewing and updating all security procedures and security-related guidance.

A summary of potential benefits resulting from this audit is at Exhibit A.

MANAGEMENT RESPONSE

On August 31, 2004, DCPS provided a written response to the recommendations in the draft report. DCPS concurred with the report, its conclusions, and its recommendations, and set fort corrective actions to improve the incident reporting process. We consider DCPS' comments to be fully responsive to the audit recommendations. The complete text of the DCPS response is included at Exhibit B.

INTRODUCTION

BACKGROUND

During the 2003 school year, the District of Columbia Public Schools (DCPS) system had 167 schools and learning centers that served approximately 65,000 students in the District of Columbia. Local, state, and federal officials are committed to providing all students and staff a safe school environment conducive to learning. In order to assist school administrators in providing a safe learning environment, government legislatures have passed laws pertaining to school security safety and incident reporting. These laws are intended to provide the school superintendents, principals, and school disciplinarians with the fullest information possible regarding the scope and nature of the disciplinary problems and misconduct in the schools, so that steps may be taken to prevent or reduce future incidents.

DCPS Board of Education (Board) Requirements

Title 5 of the District of Columbia Municipal Regulations, Chapter 25 (Student Discipline) sets forth the District's regulations regarding school safety and discipline. The regulations provide, in part, that a safe environment conducive to learning shall be maintained "in order to provide an equal and appropriate educational opportunity for all students." *Id.* at § 2500.1 Additionally, "a fair and consistent approach to student discipline" shall also be provided. *Id.* The Board applies a "zero tolerance policy," "regarding discipline for possessing, using, or threatening to use weapons or the unlawful possession, use or distribution of drugs by DCPS students on school properties or at any DCPS sponsored or supervised activity…." *Id.* The Board further requires that "[s]tudents and parents shall: (a) receive adequate and timely notification of student infractions and disciplinary action including a fair review of circumstances related to the infraction and the resulting disciplinary action; and (b) be informed of applicable rights to that review…." *Id.* at § 2500.7.

Federal Guidelines

The Federal Gun-Free Schools Act (GFSA) (20 U.S.C.A. §§ 7151(d)(2)(A)-(C) and (e) (2003)) requires the states (to include the District) to report annually to the U.S. Department of Education the number of students expelled for carrying a firearm to school, by type of firearm, and name of school. The No Child Left Behind Act of 2001 (NCLB), Pub. L. No. 107-110, § 9532(a), 115 Stat. 1425, 1984 (2002), also contains a provision, the Unsafe School Choice Option, which requires schools to implement a statewide policy giving students the choice to attend a safe public school within the District if he or she: (a) attends a persistently dangerous elementary or secondary school; or (b) becomes a victim of a violent crime while in or on the grounds of a public school the student attends.

INTRODUCTION

SECURITY SERVICES

The District of Columbia School Reform Act of 1995, Pub. L. No. 104-134, 2751, 110 Stat. 1321 (1996), required the D.C. Board of Education (Board) to enter into a security services contract for the District schools for academic year 1995-96 and each succeeding academic year. MVM, Inc. was the contractor who provided security services for the District school system for the period in which we evaluated incident reporting, September 2002 through June 2003. In July 2003, Watkins, Inc. was awarded the contract for school security services. In total, DCPS-contracted security services cost the District over $80 million as of June 2004.

DCPS Incident Reporting

In order to comply with the Board's mandates and federal requirements, the DCPS must maintain an incident reporting mechanism that can record and track incidents from initiation to final disposition. The DCPS security services contract requires the contractor to develop and maintain an incident reporting system. The accuracy of incident information stored in an incident reporting system is critical in determining which schools are identified as "persistently dangerous" as required by NCLB.[1] The information entered into this system can also be used to assess security incidents at individual schools and provide school administrators details about specific incidents so that preventive measures can be implemented quickly.

The school security services contract also requires the contractor to maintain administrative files involving all complaints, incidents, and investigations. These administrative files become the property of DCPS at the end of contract performance. In order to accomplish the contract requirements, the previous school security services contractor (MVM, Inc.) designed a security incident reporting system database using Microsoft ACCESS. The database is designed as a repository to record only the initial incident data and was not designed to track incidents from the date reported to final disposition.

Reporting Procedures for Serious Incidents

Incident reporting procedures for serious incidents begin with the School Resource Officer (SRO), Principal, Assistant Principal, or other administrative official immediately calling the DCPS Division of School Security. The Principal also notifies the appropriate Assistant Superintendent at the Office of the Superintendent. The on-site SRO notifies the Metropolitan Police Department (MPD) and/or the Fire and Emergency Medical Services

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[1] The DCPS had not established a policy for the identification and designation of unsafe schools as "persistently dangerous" as required by NCLB.

INTRODUCTION

Department (DCFEMS) as appropriate. The SRO also calls the security contractor to obtain an incident report number and to provide preliminary incident information so that this information can be entered into the incident-reporting database. The SRO then completes a Serious Incident Report (SIR)[2] that is logged in a book at the school site and then filed. The contractor generates an official incident report, which is forwarded to the DCPS Chief Investigator and the contractor's Chief Investigator. After the official incident report is generated, the Director of the DCPS Division of School Security reviews the report and determines whether the DCPS Division of School Security or contractor will investigate the case. As a general practice, the DCPS Investigative Unit and the security contractor investigate all incidents of corporal punishment[3], while MPD and the DCPS Investigative Unit conduct any high profile criminal cases jointly. However, depending on the severity of a crime, MPD usually assumes full responsibility for a criminal investigation.

After the DCPS Investigative Unit or the security contractor completes its investigation, a Report of Investigation (ROI) is prepared. The ROI contains a detailed explanation of what occurred and who was involved regarding a particular incident. The completed ROI is forwarded to the DCPS Chief Investigator for review. After the review, the ROI is submitted to the DCPS Office of the General Counsel (OGC) where the ROI is reviewed for legal sufficiency. At the completion of the OGC review, the OGC submits its determination back to the DCPS Division of School Security. If the legal decision by the OGC is that the incident cannot be substantiated, the ROI is closed. However, if the legal decision by the OGC is that the incident is substantiated, the ROI and legal decision are forwarded to the Office of the Superintendent for review. Corrective actions are the responsibility of the school principal.

DCPS Reported Incidents

During the school year ended June 19, 2003, the DCPS Security Services Division recorded approximately 2,543 incidents[4] into the incident-reporting database. The DCPS Security Procedures Manual defines 20 incident types as serious incidents. Table 1 contains 1,709 serious incidents that were reported during the September 4, 2002, through June 19, 2003 school year.[5]

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[2] A SIR is a standardized document on which information about an incident is recorded prior to entry into the incident-reporting database.

[3] Corporal punishment, as detailed in the DCPS Security Procedures Manual, is the use, or attempted use of physical force upon or against a student either intentionally or with reckless disregard for the student's safety, as punishment, or in an attempt to modify the behavior, thought, or attitude of a student.

[4] The 2,543 entries include 10 blank lines with assigned incident reporting numbers.

[5] Information obtained from the DCPS security services contractor's incident-reporting database.

INTRODUCTION

TABLE 1. SCHEDULE OF SERIOUS INCIDENTS

Type	Number Reported From September 4, 2002 - June 19, 2003
Assault	398
Aggravated Assault	8
Arson[6]	7
Blackmail	0
Bomb Threats	24
Corporal Punishment	306
Drug Offenses[7]	52
Extortion	0
False Alarm of Fire	3
Homicide (Suicide, Accidental Death)[8]	5
Hostage Situation	0
Kidnapping	1
Missing Person	15
Robbery[9]	19
Sex Offenses	17
Theft[10]	191
Threats	153
Unlawful Entry	6
Vandalism	40
Weapon Offenses	464
TOTAL	**1,709**

These 1709 serious incidents account for approximately 67 percent of the total incidents reported during the school year.

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[6] Arson includes total incidents reported as "Fire – Arson and Fire – Intentional."

[7] Drug Offenses include total incidents reported as "Distribution and Possession of Prohibited Contraband-Drugs."

[8] Homicide includes total incidents reported as "Homicide and Suicide – Attempted."

[9] Robbery includes total incidents reported as "Robbery and Robbery – Attempted."

[10] Thefts include total incidents reported as "Theft – Attempted, Theft of Government Property, Theft of Personal and Government Property, and Theft of Personal Property."

INTRODUCTION

OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of this phase of our audit was to determine whether DCPS management has established a framework to identify, resolve, and report serious school related incidents.

To accomplish our objective, we used statistical sampling software to determine our sample size of 119 of the 1,709 serious incidents, with the intent of statistically determining the total number of incidents that did not have final resolutions documented. We determined that all 119 incidents were accurately recorded in the database and conclude that the data was reliable for testing purposes. We also assessed the adequacy of DCPS security policies and procedures as well as the reliability of the data contained in the incident reporting system. In addition, we interviewed DCPS administrators and contract security service personnel.

Our audit was conducted in accordance with generally accepted auditing standards and included such tests as we considered necessary under the circumstances.

FINDINGS AND RECOMMENDATIONS

FINDING: INCIDENT REPORTING

SYNOPSIS

DCPS has not developed a comprehensive, security incident-reporting system to centrally record and track all school security incidents from initiation to final disposition. The lack of a comprehensive management information system is further complicated because of inconsistent or undeveloped school security policies and procedures which, in turn, contributed to DCPS' inability to provide the final disposition of reported incidents. There were 1,709 serious security incidents reported in the 2002-2003 school year. Many of the serious incidents appear to have not been resolved in a timely manner or the current disposition was not updated for over 1 year. A comprehensive system would afford DCPS management the ability to monitor and track school incidents for several important purposes, including timely resolution of incidents, reduction of teacher administrative leave, documentation of the event up to final disposition, and a means to monitor behavior and to prevent recurring incidents, especially by the same student.

Further, the lack of accurate and complete incident reporting data could result in DCPS not having accurate incident information necessary to comply with provisions of the NCLB Act's requirement to designate unsafe schools as "persistently dangerous" and the reporting requirements of the Federal Gun-Free Schools Act (GFSA).

DISCUSSION

During the school year September 4, 2002, through June 19, 2003, 2,543 security incidents were recorded in the DCPS security incident-reporting database by the contractor. The 2,543 incident reports covered various incident types. The DCPS Security Procedures Manual identifies 20 incident types as serious incidents. Of the 2,543 incidents reported, 1,709 were considered serious incidents.

Incident Tracking - We randomly selected 119 of the 1,709 serious incidents recorded in the incident-reporting database to determine if the incidents were recorded and reported as required by official guidelines and to identify the current and/or final disposition of each incident. We compared the original serious incident report (SIR) for the 119 security incidents with incident information recorded in the security incident database, and determined that all 119 incidents were accurately recorded in the database and had an accompanying SIR. However, we could not find a central location or repository within the DCPS that maintained information that could be used to determine the current and/or final

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disposition of all serious incidents. Further, we found inconsistent or undeveloped school security policies and procedures within the DCPS incident reporting process, which has resulted in DCPS's and the school security contractor's inability to provide on-going or final disposition information for many of the reported serious incidents. However, based on the information we were able to obtain, it appears that final dispositions of many of the security incidents have not been updated for over 1 year.

Our analysis of the data contained in the incident-reporting database for the 119 serious incident reports revealed that: (a) the "current disposition" field for 55 (46 percent) of the serious incident reports contained the word "Pending," meaning that they were still open; (b) 29 (24 percent) of the serious incidents had not been reported to MPD and/or DCFEMS, as required by the DCPS Security Policy (security policy); and (c) no evidence that 67 (56 percent) of the incidents were reported to parents as required by the security policy. Further, we attempted to trace the 119 incidents selected from our sample to the Assistant Superintendent's Office with particular emphasis on the Assistant Superintendent's disposition of each incident. Personnel in the Office of the Superintendent were unable to locate the incident reports.

Table 2 details the results of our review of the 119 serious incident reports.

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TABLE 2. DISPOSITION OF SERIOUS INCIDENT REPORTS REVIEWED

INCIDENTS	TOTAL REVIEWED	Action Taken By Security	Police/Fire Notified	Parent/ Guardian Notified	DCPS Admin. Notified	Pending As 0f 12/31/2003
Assault-Simple	27	27	12	6	0	14
Assault With Deadly Weapon	10	10	10	5	0	3
Bomb Threat	2	2	2	N/A[11]	0	0
Concealment of Deadly Weapon	21	21	9	13	0	13
Corporal Punishment	20	20	20	8	0	12
Fire-Arson	1	1	1	0	0	0
Missing Person	1	1	1	1	0	0
Possession of Prohibited Contraband (Drugs)	4	4	4	2	0	3
Suicide-Attempted	1	1	1	1	0	0
Theft of Government Property	6	6	5	N/A	0	0
Theft of Personal and Government Property	1	1	1	N/A	0	1
Theft of Personal Property	7	7	7	N/A	0	1
Threat	10	10	10	5	0	4
Unlawful Entry	1	1	1	0	0	1
Vandalism	4	4	3	1	0	1
Weapons	3	3	3	1	0	2
TOTAL	**119**	**119**	**90**	**43**	**0**	**55**

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[11] Not applicable because specific guidance is silent on notification.

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We evaluated the incidents listed above and the response to each incident to also assess the efficacy of existing security policies.

The DCPS Security Policy - The principal DCPS security policy document is the DCPS Division of School Security's Standard Operating Procedure (SOP), which all school officials and contract security personnel are required to follow. Our review of the SOP in force disclosed that it was developed sometime in 2001, although it is undated and has not been revised to reflect changes. A precise date could not be established and DCPS Division of School Security personnel acknowledged that the SOP was not updated.

Outdated Policies and Inconsistent Reporting Requirements – The SOP requires the use of the Automated Incident Reporting System (AIRS) to submit incident reports to the DCPS Division of School Security. The AIRS, however, was never implemented. Further, the SOP contains inconsistencies regarding the requirements for reporting various types of incidents. These deficiencies could result in oversight errors, inconsistent application of incident reporting requirements, and depending on the incident, could have serious implications for the student and the DCPS.

We found that Section A of the SOP is devoted to serious incidents and lists 20 categories of serious incidents. Overall guidance requires that the police, DCPS Division of School Security, and the appropriate Assistant Superintendent be notified of **every** incident in all categories. Further, the SOP contains specific guidance for each of the 20 categories of incidents. However, our review of the specific guidance revealed that information contained in some of the specific guidance did not conform to the overall policy guidance. For example, in the specific guidance for each of the 20 serious incidents, the instructions stipulated that the police be notified in only 15 categories, the DCPS Division of School Security was to be notified in 16 categories, and the Assistant Superintendent was to be notified in only 3 (see Table 3, Serious Incident Notification Matrix, for details). In contrast, as stated above, the overall guidance requires that each of these entities be notified of every incident in each category. We recognize that experienced school principals and security officers would conform to the overall guidance of notifying all three organizations. However, new or inexperienced employees, faced with a stressful situation arising out of a serious incident occurrence could use only the specific incident category guidance, overlook the overall requirements, and not call the police, DCPS Division of School Security, or the Assistant Superintendent.

Superintendent's Directive – During our review of security related documentation, we found an unnumbered and undated Superintendent's Directive that lists one of the functions of the DCPS Division of School Security as "[p]repares and updates Security Procedures Manual and Security Handbook for use by local school administrators…." Even if the

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Superintendent's Directive never was officially issued, good management practices dictate the scheduled, periodic reviews and updates of all policies and procedures.

<u>Parental and Other Security Incident Notifications</u> – Our review of the SOP's specific guidance showed that parents or guardians are to be notified in only 7 of the 20 serious incidents in which their children might be involved. Depending on the type of incident, outdated and inconsistent security policies could have serious implications for students and DCPS staff, and could result in violation of the Board's requirement that parents/guardians be notified of student infractions and disciplinary actions. Lastly, we found that incident specific guidance for 3 of 20 serious incident categories contained no instructions to contact anyone. The specific guidance consisted only of excerpts from the D.C. Code pertaining to the offense the incident covers. Accordingly, we concluded that SOP guidance on incident reporting contains confusing guidance, inconsistencies, and needs to be revised. We prepared a matrix on serious incident notifications for all 20 categories as shown in Table 3.

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TABLE 3. SERIOUS INCIDENT NOTIFICATION MATRIX

	Incident Categories	MPD	Div. of Security	Assistant Superintendent	Parent/ Guardian	No Notification
1	Assault	X	X		X	
2	Aggravated Assault	X	X			
3	Arson	X	X			
4	Blackmail					X
5	Bomb Threats	X	X			
6	Corporal Punishment					X
7	Drug Offenses	X				
8	Extortion	X	X		X	
9	False Alarm of Fire	X	X			
10	Homicide (Suicide, Accidental Death)	X	X	X		
11	Hostage Situation	X	X	X		
12	Kidnapping	X	X		X	
13	Missing Person	X	X		X	
14	Robbery	X	X			
15	Sex Offenses	X	X	X	X	
16	Theft	X	X		X	
17	Threats	X	X		X	
18	Unlawful Entry					X
19	Vandalism		X			
20	Weapon Offenses	X	X			
	TOTAL	16	16	3	7	3

The inconsistent guidance for the notification of law enforcement authorities, DCPS officials, and parents/guardians of the occurrence of a serious incident is not consistent with the Board's requirement that students and parents/guardians "shall: (a) receive adequate and timely notification of student infractions, disciplinary actions, including a fair review of

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circumstances related to the infraction and the reason for disciplinary action; and (b) be informed of applicable rights to that review."

Policies on Final Disposition of Serious Incidents – Our review of action taken by various officials in the Office of the Superintendent disclosed that the Assistant Superintendents and other DCPS officials handled each incident report as an individual staff action and once the incident was closed, neither kept a record of the final disposition of the incident. Further, information on the final disposition of incidents is not maintained in the Assistant Superintendent's offices, and there is no other central repository, automated or manual, within the DCPS that contains this information. Current policies and procedures contain no requirement for officials in the Superintendent's Office to inform the DCPS Division of School Security, individual school principals, or parents/guardians of the final disposition of an incident. Senior DCPS officials told us that, in the past, the lack of historical documentation and data caused the DCPS to lose cases in court and in arbitration. Explicit procedures and the creation of a central repository would ensure that incident closure is more effectively monitored and that final disposition actions are documented and made a matter of official record.

For example, when a serious incident report is submitted to the Superintendent's Office, and after the principal has decided to expel a student, the school principal and administrators are required to submit the expulsion documents and information to the Assistant Superintendent for Student Services. The Assistant Superintendent for Student Services is responsible for the final ruling on the proposed expulsion and for holding an appeal hearing with the parents/guardians. The Assistant Superintendent for Student Services informed us that he tracks all student expulsions and stated that there is a requirement for school principals and administrators to forward expulsion information to his office, but there is no similar requirement for suspensions. However, the Assistant Superintendent for Student Services speculated that he receives the required information only 50 percent of the time. The Assistant Superintendent for Student Services stated that when he receives the expulsion documentation, there is no supporting information attached and no formal way to correlate the action to expel a student with the incident report in which the behavioral problem originated.

Incident-Reporting Database - The incident reporting system, which contains the incident-reporting database, is an excellent system for recording and reporting security incidents. However, we found that the DCPS Division of School Security did not maintain a complete record of the history of actions taken regarding incidents reported. In the data field titled "Disposition," the word "PENDING" or statement "Referred to MPD" often appears. The security services contractor merely records the incident information and forwards a copy of the incident report to the DCPS Division of School Security. The DCPS Division of School

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Security reports the incident to the Superintendent's Office. However, there is no policy or procedure requiring the Superintendent's Office or MPD to inform the DCPS Division of School Security of final disposition actions taken. Conversely, there is no requirement for the DCPS Division of School Security to request such information and complete the database by entering final disposition information. This procedural reporting weakness has resulted in incomplete histories of actions taken in response to serious incidents. Consequently, the database becomes merely a historical event file of limited use to DCPS officials rather than a compilation of incident statistics.

An analysis of information recorded in the incident-reporting database for the 119 serious incidents in our sample revealed that, as of December 31, 2003, the incidents appear to have remained unresolved for an average of 320 days.

Table 4 provides details of the total lapsed days that the 119 incidents appear to have remained unresolved.

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TABLE 4. LAPSED DAYS TO RESOLUTION OF SERIOUS INCIDENTS

Incident Type	Number of Incidents	Lapsed Days Since Reported	Average Days Open
Assault-Simple	27	201-481	346
Assault With A Deadly Weapon	10	196-450	254
Bomb Threat	2	278-411	345
Concealment of Deadly Weapon	21	201-476	367
Corporal Punishment	20	113-461	340
Fire-Arson	1	224	-
Missing Person	1	436	-
Possession of Prohibited Contraband (Drugs)	4	373-485	435
Suicide-Attempted	1	224	-
Theft of Government Property	6	279-446	323
Theft of Personal and Government Property	1	287	-
Theft of Personal Property	7	196-419	273
Threat	10	203-379	274
Unlawful Entry	1	288	-
Vandalism	4	247-454	308
Weapons	3	84-467	260
Average Days Incidents Remained Unresolved	-	-	**320**

We discussed this issue with DCPS Division of School Security and contractor security personnel as well as school administrators and were informed that the entry "PENDING" merely indicated that final disposition action was not taken when the incident information was entered into the database. Further, we were told that the database, in its present condition, is used as an analytical and management tool in the application of security

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resources. However, DCPS Division of School Security personnel could provide no evidence to show that they used the data as an analytical and management tool. During further discussions of this issue, DCPS Division of School Security personnel did agree that final disposition information would be useful.

In our opinion, a Superintendent's directive requiring that final disposition actions be recorded and furnished to the DCPS Division of School Security for inclusion in the database would complete the history of incidents reported. Further, revisions to the SOP could include guidance to the contractor maintaining the database to take steps to make sure that final disposition data is received and recorded.

We discussed the problems noted in the areas of policies, procedures, and database management with officials of the DCPS Division of School Security and the Superintendent's Office. The Executive Director of the DCPS Division of School Security acknowledged that the SOP needed updating and revision, individual guidance on procedures governing the 20 categories of serious incidents needed to be standardized, and better guidance on database management (to include reporting final disposition on incidents) needed to be developed.

Conclusion - The fragmented security policies and procedures have contributed to the inability of DCPS to determine the current and/or final disposition of reported incidents, and whether these incidents are under investigation or closed. The seriousness of this situation is further compounded by the fact that DCPS may not be able to reliably comply with the NCLB Act and GFSA.

Although an automated tracking system is used by the contract security service, there are no standardized operational guidelines to assist the DCPS in making the incident reporting system a valuable safety management tool. Standardization would: (1) increase the reliability of incident information entered into the system's database; (2) clearly define the procedures for reporting security incidents to DCPS administrative personnel; and (3) reduce the possibility of serious incidents going uninvestigated, prevent inconsistent disciplinary actions, and decrease extended periods of time between the incident report date and the recordation of final disposition action.

FINDINGS AND RECOMMENDATIONS

RECOMMENDATIONS

We recommend the Interim Superintendent, DCPS:

1. Establish definitive policies and procedures governing the process for resolving reported incidents. These procedures should, at a minimum, establish accountability for:

   a. Recording the initial incident information and updating the incident-reporting database to reflect the final disposition of each incident;

   b. Defining the requirements for transmitting the incident information in a timely manner to the appropriate DCPS and investigative officials, including reporting student suspensions to the Assistant Superintendent for Student Services;

   c. Defining the requirement to provide periodic updates of on-going incident investigations to the appropriate DCPS officials; and

   d. Using the information contained in the incident-reporting database for developing risk assessments, special studies, and trend analyses.

2. Require that the security services contractor develop operational procedures that standardize the data elements entered into the incident reporting system.

3. Direct the DCPS Division of School Security to review and update all procedures and other security-related guidance.

4. Take action to ensure timely notification to parents/guardians of all student infractions and disciplinary actions, to include the circumstances related to the infraction and the reason for any disciplinary action taken.

5. Develop a directive that specifies how incident reports will be handled and require that the Assistant Superintendents involved in the resolution of incidents report the final disposition of every incident to the DCPS Division of School Security so that the computerized database will provide a complete history of incidents. The directive should further require appropriate security personnel to obtain information regarding status and resolution of incidents within the jurisdiction of the MPD or other law enforcement authorities.

FINDINGS AND RECOMMENDATIONS

DCPS RESPONSE (RECOMMENDATIONS 1 - 5)

The Interim Superintendent, DCPS concurred with the recommendations and has planned and taken actions to correct the noted deficiencies. The full text of DCPS's response is included at Exhibit B.

OIG COMMENTS

We consider actions taken and planned by DCPS to be fully responsive to our recommendations.

EXHIBIT A

SUMMARY OF POTENTIAL BENEFITS RESULTING FROM AUDIT

Recommendation	Description of Benefit	Amount and/or Type of Monetary Benefit
1a	Program Results. Establishes policies and procedures for accountability for recording incident information and updating the incident-reporting database to reflect the final disposition of each incident.	Nonmonetary
1b	Compliance and Internal Control. Establishes policies and procedures for defining the requirements for timely transmission of incident information to the appropriate DCPS and investigative officials.	Nonmonetary
1c	Compliance and Internal Control. Establishes policies and procedures for defining the requirement to provide periodic updates of on-going incident investigations to the appropriate DCPS officials.	Nonmonetary
1d	Program Results. Establishes policies and procedures for effectively using the information contained in the incident-reporting database.	Nonmonetary
2	Compliance and Internal Control. Requires the security services contractor to develop operational procedures that standardize the data elements entered into the incident reporting system.	Nonmonetary

EXHIBIT A

SUMMARY OF POTENTIAL BENEFITS RESULTING FROM AUDIT

Recommendation	Description of Benefit	Amount and/or Type of Monetary Benefit
3	Compliance and Internal Control. Directs the DCPS Division of School Security to review and update all procedures and other security-related guidance.	Nonmonetary
4	Program Results. Takes action to ensure timely notification to parents/guardians of all student infractions and disciplinary actions, to include the circumstances related to the infraction and the reason for any disciplinary action taken.	Nonmonetary
5	Program Results and Compliance and Internal Control. Develops a directive that specifies how incident reports will be handled and requires that the Assistant Superintendents involved in the resolution of incidents report the final disposition of every incident to the DCPS Division of School Security so that the computerized database provides a complete history of incidents. Include requirement that appropriate security personnel obtain information regarding status and resolution of incidents within the jurisdiction of the MPD or other law enforcement authorities.	Nonmonetary

EXHIBIT B

MANAGEMENT RESPONSE

chILDREN fIRST
DISTRICT OF COLUMBIA PUBLIC SCHOOLS

OFFICE OF THE SUPERINTENDENT
825 North Capitol Street, NE, 9TH Floor
Washington, D.C., 20002-1994
(202) 442-5885 – fax: (202) 442-5026

August 31, 2004

Austin A. Anderson
Interim Inspector General
Office of the Inspector General
717 14th Street, N.W., 5th Floor
Washington, D.C. 20005

RE: OIG No. 03-2-14 GA(a)
DCPS Incident Reporting – Draft Audit Report

Dear Inspector General Austin:

This letter is written in response to your correspondence dated July 29, 2004, regarding the draft audit report of the District of Columbia Public Schools' (DCPS') Incident Reporting (OIG No. 03-2-14GA(a). In your correspondence, you requested that DCPS' response include: 1) actions taken or planned, 2) target dates for completion of planned actions, and 3) reasons for any disagreements with the findings or recommendations. Our response is set forth below.

A.   **Summary Response to Findings and Recommendations 1: Incident Reporting**

Findings:

The DCPS acknowledges that there is a need to develop a comprehensive, Security Incident Reporting system to centrally record and track all school security incidents from initiation to final disposition.

The DCPS understands the need for a comprehensive management information system with consistency and developed school security policies and procedures, which would afford DCPS the ability to track school incidents for timely resolution, reduction of staff administrative leave, as well as accurate and complete information for compliance with the No Child Left Behind Act (NCLB) and the federal Gun-Free Schools Act (GFSA).

The Office of the Superintendent of Schools will convene a task group consisting of representatives from the Offices' of Security, General Counsel, Human Resources, Labor Management and Employee Relations, Student Services, Assistant Superintendents, Compliance and Policy. This task group will be responsible for recommending updated policies, reporting requirements and Superintendent's Directive(s).

EXHIBIT B

MANAGEMENT RESPONSE

School Security Audit Response
Re: Incident Reports (OIG No. 03-2-14 GA(a))
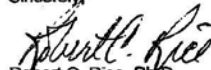
August 31, 2004
Page 2

Recommendations:

The DCPS accepts the recommendations of this draft audit and will immediately initiate the following actions to implement those recommendations.

1. Establish definitive policies and procedures governing the process for resolving reported incidents within 45 days of the date of this response.

2. Require the Security Service's Contractor to develop operational procedures that standardize the data elements entered into the incidents reporting system within seven (7) days of this response. These procedures will be forwarded to the task group for review. However the review subsequently may be subsumed under the monitoring, etc., responsibilities of the Metropolitan Police Department (MPD) in light of the Metropolitan Police Department School Safety and Security Emergency Act of 2004, Act 15-496, effective August 2, 2004.

3. The Division of School Security will immediately review and update all procedures and other security related guidance. The results of this review will be forwarded to the task group.

4. The DCPS will develop a directive to ensure the timely notification to parents/guardians of all student infractions and disciplinary actions, to include the circumstances related to the infraction and the reason for any disciplinary action taken. Said directive will be fully implemented no later than October 15, 2004.

5. Within 45 days, DCPS will develop a directive that specifies how incidents will be handled, and that requires the Assistant Superintendents and others involved in the resolution of incidents to report the final disposition to the DCPS Division of School Security, so the computerized database will have a complete history of incidents. The Directive will also require that appropriate security personnel obtain information regarding status and resolution of incidents within the jurisdiction of the MPD or other law enforcement authorities, which will be included in the computer database system

As communicated to the Inspector General in response to another security audit, DCPS is committed to effectuating corrective actions and strategic changes relating to incident reporting. All corrective action set forth above will require the collaboration of the MPD to the extent that the responsibilities assigned to them for school security services through Act 15-496 impacts upon the development and accomplishment of the specific corrective action activities and successful outcomes.

Sincerely,

Robert C. Rice, Ph.D.
Superintendent

cc: Charles Ramsey, Chief of Police, MPD
      Peter Parham, Acting Chief of Staff, DCPS
      Theodore Tuckson, Acting Director of Security Services, DCPS

"Children First, Their Future is Now!"